UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re "A Million Little Pieces Litigation"	MDL Docket No. 1771
THIS DOCUMENT RELATES TO ALL ACTIONS	

"A MILLION LITTLE PIECES" PLAINTIFFS' GROUP'S NOTICE OF MOTION FOR CONSOLIDATION AND APPOINTMENT OF CO-INTERIM CLASS COUNSEL

PLEASE TAKE NOTICE that Plaintiffs Marcia Vedral, Michele Snow, Diane Marolda, Sara Brackenrich, Jimmy Floyd, Jill Giles, Pilar More, Stuart Oswald, Shera Paglinawan, and Ann Marie Strack (hereinafter "AMLP Plaintiffs' Group," "Movant" or collectively "Plaintiffs") by and through their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating for all purposes the above-captioned related actions pursuant to F.R.C.P. 42(a); (ii) approving Movant's selection of the law firm of Brodsky & Smith, LLC and Larry D. Drury, Ltd. to serve as Co-Interim Class Counsel pursuant to F.R.C.P. 23(g); and (iii) granting such other and further relief as the Court may deem just and proper. In support of this motion, Movant submits herewith a Memorandum of Law,

Dockets.Justia.com

Declaration of Evan J. Smith, Esquire and Scott Frost, Esquire.

Dated: September 22, 2006

Respectfully submitted,

LAW OFFICES OF THOMAS M. MULLANEY

By:/s/ Thomas M. Mullaney (TM4274)
Thomas M. Mullaney, Esquire
708 Third Avenue, Suite 2500
New York, NY 10017
Telephone: (212) 223-0800
Facsimile: (212) 661-9860

Liaison Counsel for Class and
Attorneys for Plaintiff Diane Marolda

BRODSKY & SMITH, LLC

By: /s Evan J. Smith, Esquire (ES3254)
Evan J. Smith, Esquire (ES3254)
240 Mineola Blvd.
Mineola, NY 11501
Telephone: (516) 741-4977
Facsimile: (516) 741-0626

[Proposed] Co-Interim Class Counsel
and Attorneys for Plaintiff Michele Snow

Larry D. Drury, Esquire
Larry D. Drury, Ltd.
205 W. Randolph Street, Suite 1430
Chicago, IL 60606
Telephone: (312) 346-7950
Facsimile: (312) 346-5777

[Proposed] Co-Interim Class Counsel
and Attorneys for Plaintiff Marcia Vedral

John H. Alexander, Esquire
John H. Alexander & Associates, LLC
100 West Monroe, 21st Floor
Chicago, IL 60602

Attorney for Plaintiff Marcia Vedral

[Additional Counsel Appear on Next Page]

Alan S. Ripka, Esquire
Napoli Berm Ripka
115 Broadway
New York, NY 10006
Attorney for Plaintiff Jimmy Floyd

Thomas E. Pakenas, Esquire
Dale and Pakenas
641 Lake Street, Suite 400
Chicago, Il 60661
Attorney for Plaintiff Pilar More

Thomas A. Zimmerman, Jr., Esquire
Zimmerman and Associates, P.C.
100 West Monroe, Suite 1300
Chicago, IL 60603
Attorney for Plaintiff Ann Marie Atrack

Michael David Myers, Esquire
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, WA 98101
Attorney for Plaintiffs Shera Paglinawan and Wendy Shaw

Scott C. Frost, Esquire
Statman, Harris, Siegel & Eyrich, LLC
333 West Wacker Drive, Suite 1710
Chicago, IL 60606
Attorney for Plaintiff Jill Giles

John H. Alexander, Esquire
John H. Alexander & Associates, LLC
100 West Monroe, 21st Floor
Chicago, IL 60602
Attorney for Plaintiff Marcia Vedral

Brian C. Witter, Esquire
DiTommaso Lubin
17 West 220, 22nd Street
Oakbrook Terrace, IL 60181
Attorneys for Plaintiff Sara Brackenrich